RCRA Compliance Evaluation Inspection Report

Facility:

United Parcel Service 325 West Houston New York, NY 10013

(212) 229-0968

EPA I.D. Number:

NYD 986 902 971

Facility Representative:

Dominick Casamassina District Plant Engineering Metro New York District

EPA Representative:

Tom Prol 2DECA-RCB-HWCS

Report:

A RCRA Compliance Evaluation Inspection (CEI) was conducted at the above-named facility on Tuesday April 27, 1999, with entry made at approximately 10 a.m. The facility is a CESQG and appeared to be in compliance with RCRA Hazardous Waste Regulations and UST requirements at the time of the inspection. A follow-up letter to this effect should be sent to the facility (attached).

Prol held an opening conference with the facility representative and discussed the hazardous waste use and handling practices at the facility. The representative seemed knowledgeable of the RCRA regulations, but was uncertain regarding UST regulations as the tanks are handled by another company personnel at a UPS facility across the street.

Prol walked with the facility representative throughout the first building of the facility, reviewing hazardous waste usage, which was minimal and confined to truck maintenance performed onsite. Additionally, the representative noted that UPS occasionally disposes of wastes that result from torn or opened packages in the process of shipping. When asked about these sporadic waste generations, the representative stated that 100 per cent of the time the facility is able to determine what type of waste is involved and can make a hazardous waste determination.

Prol also spoke via phone with the man in charge of this "DMP" or Damaged Material Program who described the training and consultant UPS retains to handles identification response and disposal of any hazardous materials that become a waste. There are an average of two spills per month and, he noted, UPS has adequate spill containment, trains employees to leave the area, and said the material is "cleaned up and shipped after testing." The employees have a twelve-hour course with four-hour refresher for training in safety. Usually, he noted, the identification can be made based on shipping papers or other written materials that accompany the shipped material. These wastes spills are between one and forty pounds on average. UPS uses the following HW codes: D001, D004, D006, D006 and D035. Also, the facility has a minor welding operation within its automotive repair department.

Tool 1

The facility representative also noted that the facility's drain sludge is shipped as hazardous waste, based on annual testing (see attached). The representative stated that he does not want to see this sludge as a hazardous waste, but could not figure out a way to make it fall below regulatory thresholds. A copy of the test results are attached.

Prol then walked to an adjacent lot in which a trailer is located for storage of hazardous waste. The trailer is equipped with cooling vent designed to kick a fan on when the temperature reaches a certain level. Inside were three HW drums, dated 4/5/99, labeled D001 and D035. These wastes are picked up every month according to the facility representative.

The representative accompanied Prol to the second facility building and Prol inquired about the maintenance herein, the wastes generated and the three USTs located underneath. (A Veeder Root-250 printout sheet is attached.) This review of the USTs was done only for the purpose of a possible referral to WCB and was not a full inspection thereof. Nobody was available to discuss the UST operations and the facility representative was uncertain about this area.

Mailinckrodt™

Laboratory Chemical Disposal Service

P.O. Box 800 - Paris, KY 40362-9996 1-800-LAB-PAK1 (522-7251) 1-606-987-7000

July 16, 1998

United Parcel Service Dominick Casamassina 325 West Houston Street New York, NY 10013 212-924-5896

Dear Dominick:

Following is a profile describing the waste for which you submitted a Facility Waste Notification (FWN). The information that appears on the profile was determined by the information supplied on the FWN form (temporary I.D.# 031998A/B). This FWN was confirmed based on the information provided (assigned a drum number and labelling information faxed). This document is for your files. Please review it closely. If the waste for which you submitted the FWN differs from this profile, please contact our office immediately.

We are pleased to offer our disposal service as follows:

PROFILE #

DESCRIPTION

PRICE

152526-1

Fuel/Detergent Sludge

\$200.00/drum

In the future when you have additional drums of the exact waste profiled, you will only need to complete a FWN form, referencing the quote number listed, and FAX it in. Wastes which do not match the description on the attached profile will need to be submitted separately for evaluation. This can be done by completing a FWN with all available information and sending it in. If there is additional information needed, a representative will contact you so that a waste stream profile can be established.

Thank you for the opportunity to provide disposal services for your facility generated waste. If you need any additional information, please contact me at 800-522-7251.

Sincerely,

Judy Waugh

Eustomer Service Representative

Attachment

cc: Tony Testani

Ellen Ackerman

GENERATOR

UNITED PARCEL SERVICE

NEW YORK, NY 10013 CHARLES ARHAKOS

325 WEST HOUSTON STREET

MALLINCKRODT BAKER

317 24NO. 9828 PP. 2/2

SERVICE LOCATION

INDIANAPOLIS

152526-1

QUOTE

WASTESTREAM 17891-8

CORPORATE HEADQUARTERS
HERITAGE ENVIRONMENTAL SERVICES, INC.
7901 WEST MORRIS STREET • INDIANAPOLIS, IN 48231
TELEPHONE 317/243-0811

Internet: http://www.heritage-enviro.com WASTESTREAM PROFILE

WASTE DUSCHIPTION / COMMON NAME FUEL/DETERGENT SLUDGE	PRODUCT	PRODUCT TYPE
PROCESS GENERATING	123	FUEL BLENDER PHYSICAL STATE AT 70-F
SLUDGE REMOVAL	BLK/BROWN	SLUDGE

HAZARD TYPL EPA HAZARD CODES CHARACTERISTIC D004, D007, D008, D005, D006, D009, D001 DOT HAZARD CLASS FPA FORM COUL FLAMMABLE SOLID TOX. CHARC. ARSENIC DOT DESCRIPTION

RQ, WASTE FLAMMABLE SOLIDS, TOXIC, ORGANIC, N.O.S., 4.1, UN2926, PG [], (FUEL) (D001,D004,

,D005,D006) ERG# 134

PROCESS MATHIX CODE

UPON LABORATORY ANALYSIS OF A REPRESENTATIVE SAMPLE, THE FOLLOWING MAJOR CONSTITUENTS WERE EVALUATED:

PARAMETER	RESULT	DM1	DLT. UMIT	ALLOWABLE RANGE
ARSENIC BARIUM CADMIUM CHROMIUM DETERGENT SLUDGE FUEL LEAD MERCURY DIL SLUDGE	15.7 171 7.2 5.5 >20 <10 29 1.37	MG/KG MG/KG MG/KG PERCENT PERCENT MG/KG PPM PERCENT		•
			,	

cils, cily wastes or other materials shipped to Heritage, which contain detectable levels of PCB's (Polychlorinated Biphenyls) will subject the prator (or other responsible party) to all reasonable costs for proper transport, disposal and or decontamination of all contaminated materials and

erators of oils, or oily wastes must provide a certification to Heritage that the waste is not contaminated with any constituents other than those lental to normal use.

IERATOR WARRANTY: To the best of my knowledge the above is a true, accurate and complete description of the waste material offered for disposal for reclamation.

(ORIGINAL) PLEASE RETAIN

X X X X K END X X X X X

T 1:DIESEL PAST

INVENTORY REPORT

SYSTEM STATUS REPORT

MA 42:01 999 10:54 AM

UPS HOUSTON ST. HOUSTON ST. 10013

INSPECTOR'S MULTI-MEDIA CHECKLIST

RADIATION

Facility Name:	United Pa	arcel Service	
Facility Address:	325 West	Houston	TERCOVITO DO SOLO
	NEW YO	RK, NY 10013	6.547
Facility ID No.:	_NYD 986 9	02 971	la a vitlino. Ha su Julius ser samb
Facility Contact:	District Plan	asamassina (212) 229-0968 t Engineering	
	Metro New Y	I OIK DISHICL	
Inspector's Name:	THOMAS	S H. PROL	
Inspector's Phone:	212-637-4	157 Division/Branch:	DECA/RCB_
Date of Inspection:	_April 27, 19	999	
Referred to:	N/A	Date:	
[with copy to Charle	es Zafonte, MM	Coordinator, for tracking.]	ารกับ ๆ 65สามารถเกา ได้เราได้ (เกาเกรสา)
Date Response Rece	eived:		inches swee
In Compliance: You	es No_	mentera di Principia denality i sita	
If Yes: Violation R	Resolved		
Action Taken	(describe)	and the origins while.	Usuda. (4.4), Marium
	toleva trons 1	a Glastykana (Glanced Y Med	nessay to sinke

RADIATION

	4		
As 1.	Are any radioactive materials used or stored at this facility?	YES	_X_NO
	AIR COMPLIANCE		
1.	With sun <u>BEHIND</u> you, observe: Is opaque smoke being emitted from a sopening?	mokestack, ve YES*	nt or _X_NO
3.	A. Has the facility added any processes or expanded any pre-existing years?		ne last two S _X_NO
4.	A. Has the facility undergone any renovations or demolitions during involved the removal or disturbance of asbestos-containing materi		onths which S _X_NO
5.	A. Does the facility have any air conditioning/refrigeration equipment where perform service on involving the refrigerant ? (i.e., maintaining, servicing of equipment. This applies ONLY to refrigerants that contain CFC's .)	g, repairing, or	•
	WATER-NPDES, UIC, UST, PWSS		
	Circle as applicable: Does the facility generate industrial wastewater (IW)/W) and/or storm water (SW) and dispose into:	sanitary wast	ewater
a. b. c. d. e. f.	receiving stream/surface water body or onto ground near enough to impact or sanitary sewer system which discharges to municipal treatment plant? (POTV storm water sewer system? subsurface disposal system (septic system, drywell, cesspool, sinkhole)? trucked off site? onto ground surface (e.g. spray, discharge pipe, open trench) Ascertain the name of stream and/or name(s) and type(s) of sewer system.	/) IW WW IW* WW	SW 7* SW 7* SW SW
2	 a. Note: Are there floor drains, sinks (other than in bathrooms), storm water 1) in an area where raw materials, products, wastes or wastewaters are generand/or 2) that are possibly receiving wastes due to poor housekeeping, etc.? b.If yes, is there fluid in drain/structure? c. If yes to a, is there evidence that contaminants entered drain/structure (e.g smells, staining of drain or floor near drain, any discharge smells/appears con YES*NO 	ated, stored or YE YE fluid discolor	transported S* _X_NO SNO

¹ Discharges to surface water bodies from "point sources" are regulated by EPA. It is a point source if the fluid flows through a discreet conveyance such as a pipe, ditch, tunnel, conduit into or near enough to impact a wetland, stream, lake, etc.

3. A. Does the facility have on site Material Safety Data Sheets (MSDS) for all hazardous chemicals

N/A

used, as required under OSHA's Hazard Communication Standard?

d. Ask: What types of fluids enter drains/structures: SOME RAIN WATER, THIS IS A

TOXIC RELEASE INVENTORY (TRI)

For manufacturing facilities ask 1-2: 1. Does the facility have more than 10 or more full time employees? 2. Is the facility classified under SIC codes 20-39? 3. Is facility classified under any of the following sectors? YES_X_NO YES_X_NO					
YES	NO	Type of facility	YES	NO	Type of facility
	X	commercial hazardous waste treatment		X	petroleum bulk terminals
	X	metal mining,	-	X	chemical wholesale
	X	coal mining		X	solvent recovery services.
	X	electric utilities			
 4. Does the facility treat, dispose, or stabilize over 10,000 pounds of a chemical per year?YesX_No					
	Exclude equipment containing less than 3 lbs (1 quart) of fluid. Only include utility owned equipment if inspecting the utility. YESX_NO				
2. Does the facility have any hydraulic systems manufactured before 1980 which use or used high temperature fluid?YESX_NO					
3.	3. Does the facility have any oil filled heat transfer systems manufactured before 1980?YES _X_NO				
4.	4. Does the facility have PCB waste stored for disposal?YES* _X_NC				
General Chemical Regulations - 40 CFR Parts 700-723					
		e facility manufacture, or import in nufacturer/importer?	to the U	nited S	States, any chemicals for which they are theYESX_NO

SPILL PREVENTION, CONTROL AND COUNTERMEASURE (SPCC) 40 CFR Part 112.1-112.7

1	40 CFR Part 112.1-112.	/		
cate the	Ask:	And the Angles	M NO	
	1. A. Does the facility store oil?	YES	_X_NO	Į
	Note: Oil is not limited to petroleum oil; for example, vegetable oi	il and transformer oi	l are regulat	ed oils.
	3. Did the facility have an oil spill within the last 12 months?	YES*	_X_NO	
	Facility Response Plan (FI	RP)		
	10 CVID D	rias there been any a		
	1) Does the facility have an above-ground oil storage capacity the gallons <u>and</u> conduct operations that include over-water transfers of	f oil to or from vesse	-	
	 Does the facility have an oil storage capacity greater than or eq — Yes* _X_ No 	ual to one million ga	llons?	
	3) Did the facility submit a Facility Response Plan to the EPA?		Yes _X_	No
	WETLANDS			
	1. Observe: A. Are there any wet areas (<u>i.e.</u> , marshes, swamps, bogs) of	on or adjacent to the	site with or	withou
	wetlands-type vegetation such as cattails, rushes, or sedges	100		X_NO
	Sketches of several common wetlands plants are attached. Note the			
	order for an area to be designated a federal wetland; and some we B. Are there any waterbodies or waterways on or adjacent			esent. X_NO
	THEY ARE LOCATED A COUPLE OF CITY BLOCKS AWAY (WITH W. SIDE HWY IN BETWEEN)	FROM THE HUDS	ON RIVER	i
	FEDERAL INSECTICIDE, FUNGICIDE AND RO	DENTICIDE ACT	(FIFRA)	
	1. If the inspection is conducted at a manufacturing facility,	ask the following:		
	A. Are there any pesticides manufactured, relabeled, or repa	ackaged at this establ	ishment?	
	REMAINING QUESTIONS WERE N/A			

CRIMINAL ACTS

follow	ing:	ould indicate the
	1. Is the facility involved in deliberate acts of dumping or discharging wastes?	Yes* <u>_X</u> _ No
concea No	2. Is there any evidence of bad intent or conduct? For example, falsification or real activities?	ecords or efforts toYes* <u>X</u>
	3. Has there been any actual harm to individuals as a result of violations?	Yes* <u>X</u> No
	4. Other activity or behavior which you believe indicates criminal behavior?	Yes* <u>X</u> No

Refer to Criminal Investigation Division if you checked Yes.



ACKNOWLEDGEMENT OF NOTIFICATION

OF HAZARDOUS WASTE ACTIVITY

06/19/90

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER ->

NYD986902971

FACILITY NAME ->

UNITED PARCEL SERVICE

MAILING ADDRESS ->

325 W HOUSTON ST NEW YORK, NY 10013

INSTALLATION ADDRESS ->

325 W HOUSTON ST NEW YORK, NY 10013

EPA Form 8700-12AB (4-80)

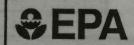
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II
26 FEDERAL PLAZA
NEW YORK, NEW YORK 10278

ATTN: PERMITS ADMINISTRATION BRANCH, ROOM 505

TO: LEE VERNAL FLEET MGR UNITED PARCEL SERVICE 325 W HOUSTON ST NEW YORK, NY 10013

Form Approved. OMB No. 2050-0028. Expires 10-31-91 GSA No. 0246-EPA-OT

Please refer to the Instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



Notification of Regulated Waste Activity

Date Received (For Official Use Only)

90-05-30

United States Environmental Protection Agency	STATE OF THE PARTY
I. Installation's EPA ID Number (Mark 'X' in the appropriate box)	PENNET.
A. First Notification B. Subsequent Notification (complete item C) C. Installation's EPA ID Number N Y D 9 8 6 9 0 2 9	0/
II. Name of Installation (Include company and specific site name)	
ANITED PARCEL SERVICE	
III. Location of Installation (Physical address not P.O. Box or Route Number)	
Street	
BLS WEST HOUSTON ST.	
Street (continued)	
City or Tours	
City or Town State ZIP Code	
IEW YORK CITY NY10013-	100 Mg
ounty Code County Name	MAR ASS
V. Installation Mailing Address (Sector)	
V. Installation Mailing Address (See instructions)	
Street or P.O. Box	A STATE OF THE STA
AME	Hall Id
City or Town State ZIP Code	
V. Installation Contact (Person to be contacted regarding waste activities at site)	
Name (last) (first)	
EE VERNAL	
lob Title Phone Number (area code and number)	
LEET MANAGER 212-560-6466	750
/I. Installation Contact Address (See instructions)	
Contact Address B. Street or P.O. Box	
ity or Town State ZIP Code	BINGS AND DE
a lili o y liid aada a la miu ria a la	(2 1 to 6 to
III. Ownership (See instructions)	
A. Name of Installation's Legal Owner	
DET ALL BUT AL	0 12/1-1
Street, P.O. Box, or Route Number	> prys (
25 SPRING ST WW WATER REVIY 6/21/	90 PB
State ZIP Code	6.
EWYORK CITY NY10013-	6
Phone Number (area code and number) B. Land Type C. Owner Type D. Change of Owner (Date Char Indicator Month Day	nged) Y Year
201-714-7462 P P Yes No	

		ID - For Official Use Only
VIII. Type of Regulated Waste Activity (Mark 'X' in	the appropriate boxes. Refer to	instructions.)
A. Hazardous Waste Activ		B. Used Oil Fuel Activities
a. Greater than 1000kg/mo (2,200 lbs.) b. 100 to 1000 kg/mo (220 - 2,200 lbs.) c. Less than 100 kg/mo (220 lbs.) 2. Transporter (Indicate Mode in boxes 1-5 below) a. For own waste only b. For commercial purposes Mode of Transportation 1. Air 2. Rail	Treater, Storer, Disposer (at installation Note: A permit is required for this activity; see instructions. Hazardous Waste Fuel a. Generator Marketing to Burner b. Other Marketers c. Burner - indicate device(s) - Type of Combustion Device 1. Utility Boiler 2. Industrial Boiler 3. Industrial Furnace Underground Injection Control	1. Off-Specification Used Oil Fuel a. Generator Marketing to Burner b. Other Markerer c. Burner - indicate device(s) - Type of Combustion Device 1. Utility Boiler 2. Industrial Boiler 3. Industrial Furnace
IX. Description of Regulated Wastes (Use addition	nal sheets if necessary)	
7 8 C. Other Wastes. (State or other wastes requiring an I.D.	See instructions if you need to list more 4 9 10	number(s) for the EP Toxic contaminant(s)) 5
X. Certification		8
I certify under penalty of law that I have personal and all attached documents, and that based obtaining the information, I believe that the subthat there are significant penalties for submitments.	on my inquiry of those indiv ubmitted information is true, a	iduals immediately responsible for occurate, and complete. I am aware
- 5	d Official Title (type or print)	Date Signed
Domanier liagra Domani	CK PLAZZA DIST AUTO	HGR 5-23-90
XI. Comments		
Verities	6/21/90 DW	NOR OF BUSINESS
Uniter PARCEl Senvi	CE 51 WER	NOR OF BUSINESS
PREWWICH CT	- 06830	e billiard world
Note: Mail completed form to the appropriate EPA Regi	ional or State Office. (See Section II	I of the booklet for addresses.)

MAY 1 4 1999

Dominick Casamassina District Plant Engineering Metro New York District United Parcel Service 325 West Houston New York, NY 10013

RE:

United Parcel Service

EPA ID No. NYD 986 902 971

Dear Mr. Casamassina:

This letter is in reference to the compliance evaluation inspection conducted at your facility on April 27, 1999, by Mr. Thomas Prol of the U.S. Environmental Protection Agency (EPA), RCRA Compliance Branch.

At the time of the inspection, the referenced facility was found to be in compliance with the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984, 42 U.S.C. § 6901, 6928.

Your facility has a continuing obligation to comply with all applicable State and Federal regulations regarding the management of solid and hazardous waste. If you have any questions, please contact Mr. Prol at (212) 637-4157.

Sincerely,

Joel Golumbek, Chief Hazardous Waste Compliance Section RCRA Compliance Branch

cc:

Salvatore Carlomagno, Chief

Compliance Section

New York State Department of Environmental Conservation

Division of Hazardous Waste Facilities

50 Wolf Road

Albany, NY 12233-7252

bcc:

Tom Prol DECA/RCB

RCRA file Room